

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Decrease Its Revenues) Case No. ER-2019-0335
for Electric Service)

PUBLIC COUNSEL'S NOTICE OF DISCOVERY DISPUTE

COMES NOW the Office of the Public Counsel and, as the Commission directed in its August 15, 2019, *Order Setting Test Year and Adopting Procedural Schedule*, hereby notifies the Commission that the Office of the Public Counsel and Union Electric Company d/b/a Ameren Missouri have a disagreement regarding the following Office of the Public Counsel data request:

3013. Ameren Missouri's rate of return ("ROR") witness, Robert Hevert, sponsored ROR testimony in the recent Kansas City Power & Light Company and KCP&L Greater Missouri Operations rate cases, Case Nos. ER-2018-0145 and ER-2018-0146. Please provide the Excel version of the schedules Mr. Hevert attached to his Direct, Rebuttal and Surrebuttal testimonies in those cases.

The disagreement is over Union Electric Company d/b/a Ameren Missouri's objection:

The Company objects to DR No. 3013 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

WHEREFORE, the Office of the Public Counsel notifies the Commission of the foregoing discovery disagreement in advance of the discovery conference scheduled for 10:00 a.m., September 19, 2019, in anticipation of the Commission taking it up then.

Respectfully,

/s/ Nathan Williams

Nathan Williams
Chief Deputy Public Counsel
Missouri Bar No. 35512

Office of the Public Counsel
Post Office Box 2230
Jefferson City, MO 65102
(573) 526-4975 (Voice)
(573) 751-5562 (FAX)
Nathan.Williams@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 17th day of September 2019.

/s/ Nathan Williams